

LOCKRIDGE GRINDAL NAUEN PLLP

W. Joseph Bruckner (admitted *pro hac vice*)
Brian D. Clark (admitted *pro hac vice*)
100 Washington Ave S, Suite 2200
Minneapolis, MN 55401
Phone: (612) 596-4001/Fax: (612) 339-0981
wjbruckner@locklaw.com
bdclark@locklaw.com

LOCKRIDGE GRINDAL NAUEN PLLP

Kyle Pozan (admitted *pro hac vice*)
1165 N. Clark Street, Ste. 700
Chicago, IL 60610
Phone: (612) 339-6900
Email: kjpozan@locklaw.com

*Counsel for the Proposed Class and Attorneys for
Individual and Representative Plaintiffs Kajan Johnson,
Clarence Dollaway and Tristan Connelly*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Kajan Johnson, Clarence Dollaway, and Tristan
Connelly, on behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

Zuffa LLC, Zuffa Parent LLC n/k/a TKO
Operating Company, LLC (d/b/a Ultimate
Fighting Championship and UFC), and Endeavor
Group Holdings, Inc.,

Defendants.

2:21-cv-01189-RFB-BNW

**DECLARATION OF W. JOSEPH
BRUCKNER IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANT
ENDEAVOR GROUP HOLDINGS, INC.'S
FOURTH MOTION TO DISMISS
PLAINTIFFS' AMENDED COMPLAINT**

1 I, W. Joseph Bruckner, declare as follows:

2 1. I am a partner of the law firm of Lockridge Grindal Nauen PLLP, counsel for the proposed
3 class and attorneys for individual and representative Plaintiffs Kajan Johnson, Clarence Dollaway, and
4 Tristan Connelly in *Johnson v. Zuffa, LLC*, No. 2:21-cv1189 (D. Nev.)). I am a member in good standing
5 of the State Bar of Minnesota and have been admitted pro hac vice in this Court. I am over 18 years of age
6 and have personal knowledge of the facts stated in this Declaration. If called as a witness, I could and
7 would testify competently to them.

8 2. I make this Declaration in support of Plaintiffs' Opposition to Defendant Endeavor Group
9 Holdings, Inc.'s Fourth Motion to Dismiss Plaintiffs' Amended Complaint.

10 3. Attached as Exhibit 1 is a true and correct copy of Defendant Endeavor Group Holdings,
11 Inc.'s Responses and Objections to Plaintiffs' First Requests for Production of Documents.

12
13 I declare under penalty of perjury under the laws of the United States that the foregoing is true and
14 correct. Executed on this 21st day of October, 2024, in Minneapolis, MN.

15
16
17 s/ W. Joseph Bruckner
18
19
20
21
22
23
24
25
26
27
28

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Declaration of W. Joseph Bruckner In Support of Plaintiffs' Opposition to Defendant Endeavor Group Holdings, Inc.'s Fourth Motion to Dismiss Plaintiffs' Amended Complaint was served on October 21, 2024 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

/s/ W. Joseph Bruckner

W. Joseph Bruckner

LOCKRIDGE GRINDAL NAUEN PLLP